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STAPLES THE OFFICE SUPERSTORE, LLC

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

KRISTOFER GIORDANI, on behalf of  
himself and others similarly situated

Plaintiff,

vs.

STAPLES THE OFFICE  
SUPERSTORE, LLC; and DOES 1 to  
100, inclusive,

Defendants.

Case No. 5:24-cv-02224-CAS (PDx)

**DEFENDANT'S NOTICE OF  
RELATED CASES**

[CIVIL L.R. 7.1-1; FRCP 7.1]

Assigned to the Hon. Christina A. Snyder

Action Filed: September 6, 2024  
Removed: October 18, 2024

Pursuant to Civil Local Rule 83-1.3 of the United States District Court for the  
Central District of California, Defendant Staples the Office Superstore, LLC  
(Staples) hereby provides this Notice of the following related cases:

1. This Action: *Kristofer Giordani, on behalf of himself and others  
similarly situated v. Staples the Office Superstore, LLC*, Case No. 5:24-cv-02224-  
CAS (PDx), was filed on September 6, 2024 in the Superior Court of the State of  
California for the County of Riverside and was removed to the Central District of  
California by Staples on October 18, 2024. On November 5, 2024, the Honorable

1 Judge Snyder issued an Order Re Transfer (Related Cases) consenting to the  
2 transfer of *Giordani* to her calendar.

3 Plaintiff Kristofer Giordani asserts claims for alleged (1) violation of  
4 California Labor Code sections 1194 and 1197 (unpaid minimum wages),  
5 (2) violation of California Labor Code sections 510, and 1194 (unpaid overtime),  
6 (3) violation of California Labor Code sections 512 and 226.7 (failure to authorize  
7 or permit meal periods), (4) violation of California Labor Code section 226.7  
8 (failure to authorize or permit rest periods), (5) violation of California Labor Code  
9 section 226 (non-compliant wage statements), (6) violation of California Labor  
10 Code sections 201, 202, and 203 (wages not timely paid upon termination), and  
11 (7) violation of California Labor Code section 17200, et seq. (unlawful business  
12 practices). Plaintiff Giordani's putative classes include all current and former  
13 hourly non-exempt employees employed by Staples in California at any time since  
14 September 6, 2020 who suffered any of the violations alleged in the action.

15 2. Related Action: *Alissa Torres, individually, and on behalf of other*  
16 *members of the general public similarly situated, and as an aggrieved employee*  
17 *pursuant to the Private Attorneys General Act ("PAGA") v. Staples the Office*  
18 *Superstore, LLC*, Case No. 5:24-cv-01352-CAS-PDx, was filed on April 30, 2024  
19 in the Superior Court of the State of California for the County of San Bernardino  
20 and was removed to the Central District of California by Staples on June 27, 2024.  
21 *Torres* is pending before the Honorable Christina A. Snyder. Plaintiff Alissa Torres  
22 asserts claims for alleged (1) unpaid overtime, (2) unpaid minimum wages,  
23 (3) failure to provide meal periods, (4) failure to authorize and permit rest periods,  
24 (5) non-compliant wage statements and failure to maintain payroll records,  
25 (6) wages not timely paid upon termination, (7) failure to timely pay wages during  
26 employment, (8) unreimbursed business expenses, (9) civil penalties for violations  
27 of California Labor Code, pursuant to PAGA, §§ 2698 et seq., (10) unlawful  
28 business practices pursuant to California Business & Professions Code section

1 17200 et seq., and (11) unfair business practices pursuant to California Business &  
2 Professions Code section 17200 et seq. The putative class in *Torres* consists of all  
3 persons who have worked for Staples as non-exempt, hourly paid employees in  
4 California at any time since September 18, 2021.

5 3. Related Action: *Teri Weiser, on behalf of herself and on behalf of all*  
6 *persons similarly situated v. Staples the Office Superstore, LLC, Staples Contract &*  
7 *Commercial LLC, and Staples, Inc.* was filed on October 15, 2024 in the Superior  
8 Court of the State of California for the County of Los Angeles and was removed to  
9 the Central District of California by Staples today, November 14, 2024. Plaintiff  
10 Teri Weiser asserts claims for alleged (1) violation of California Business &  
11 Professions Code section 17200 et seq. (unfair competition); (2) violation of  
12 California Labor Code sections 1194, 1197, 1197.1 (unpaid minimum wages),  
13 (3) violation of California Labor Code sections 510 (unpaid overtime), (4) violation  
14 of California Labor Code sections 512 and 226.7 (failure to provide meal periods),  
15 (5) violation of California Labor Code sections 512 and 226.7 (failure to provide  
16 required rest periods), (6) violation of California Labor Code section 226 (non-  
17 compliant wage statements), (7) violation of California Labor Code section 2802  
18 (failure to reimburse for required business expenses); (8) violation of California  
19 Labor Code sections 201, 202, and 203 (wages not timely paid upon termination),  
20 and (9) violation of California Labor Code sections 201-203, 233, 246 (failure to  
21 pay sick pay wages). Plaintiff Weiser's putative class includes all current and  
22 former hourly non-exempt employees employed by Staples in California at any time  
23 since October 15, 2020.<sup>1</sup>

24  
25 <sup>1</sup> Plaintiff Weiser improperly names two additional defendants, Staples, Inc. and  
26 Staples Contract & Commercial LLC, which never employed Plaintiff Weiser. In  
27 *Torres*, the parties stipulated and the Court entered an order dismissing Staples, Inc.  
28 as a defendant on the grounds that Staples, Inc. "has not employed, controlled, or  
supervised Plaintiff or any putative class members, nor has it created, maintained,  
or implemented any of the wage and hour policies at issue in this litigation."  
(Stipulation to Dismiss Staples, Inc. & Allow Plaintiff to File First Amended  
Complaint filed Oct. 28, 2024 (ECF No. 21); Order Dismissing Defendant Staples,

1 Plaintiff Weiser asserts claims overlapping those in *Torres* and *Giordani* (for  
2 alleged unpaid minimum wages, unpaid overtime, meal and rest break violations,  
3 wage statement violations, untimely paid final wages, and unfair or unlawful  
4 business practices) on behalf of a putative class that overlaps with the putative  
5 classes pled in *Torres* and *Giordani* (current and former hourly, non-exempt Staples  
6 employees in California).

7 Given this overlap in claims and putative classes, there may be substantial  
8 and unnecessary duplication of labor if the cases were heard by different judges.  
9 Accordingly, for the same reasons the Honorable Judge Snyder consented to the  
10 transfer of *Giordani*, in the interests of judicial economy and consistency, it may be  
11 appropriate to relate these actions and transfer *Weiser* to the Honorable Judge  
12 Snyder. (C.D. Cal. General Order 16-05, Sections II.I.1.b and II.I.2.)

13  
14 DATED: November 14, 2024

DAVIS WRIGHT TREMAINE LLP

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16  
17 By: /s/ David P. Zins

David P. Zins

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19 Attorneys for Defendant  
20 STAPLES THE OFFICE  
21 SUPERSTORE, LLC  
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28 Inc. and Granting Plaintiff Leave to File a First Amended Complaint filed Oct. 30,  
2024 (ECF 22).)